

JEREMY FARRELL

CORPORATION COUNSEL

Chaunelle Robinson- ID No.: 908002012

City of Jersey City-Law Department

City Hall-280 Grove Street

Jersey City, New Jersey 07302

Telephone (201) 547-5229

Attorney for Defendants, City of Jersey City and Jersey City Police
Department

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Timothy Williams, : Civil Action No.:

:

Plaintiff, :

v. :

:

CITY OF JERSEY CITY, JERSEY :

CITY POLICE DEPARTMENT and :

JOHN DOES 1 THROUGH 10 :

:

NOTICE OF REMOVAL

(28 U.S.C. 1441(b))

:

:

Defendants. :

:

**TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

The petitioners, City of Jersey City and Jersey City Police
Department, herein ("Defendants"), having a business address of
280 Grove St., Jersey City, New Jersey, 07302, respectfully
show:

1. Defendants, by their attorney, Jeremy Farrell,
Corporation Counsel (Chaunelle Robinson, Assistant
Corporation Counsel appearing), hereby seek removal of
this action to the United States District Court for
the District of New Jersey as the above captioned
action is a civil action of which the United States

District Court has original jurisdiction under 28 U.S.C. §1331(a), and is one which may be removed to the United States District Court for the District of New Jersey by the Defendants as one which arises under federal law.

2. On March 28, 2017, the Defendants were served with a Summons and Complaint filed on behalf of the Plaintiff, alleging claims arising under state law. A copy of the Complaint is attached hereto as "Exhibit A."

3. The Complaint alleges the following claims:

- a. Assault and Battery;
- b. Deprivation of Civil Rights;
- c. Abuse of Process;
- d. False Imprisonment;
- e. False Arrest;
- f. Intentional Infliction of Emotional Distress;
- g. Defamation;
- h. Malicious Prosecution;
- i. Negligence;
- j. Negligent Hiring, Training, Supervising and Retention;
- k. Vicarious Liability;
- l. Conspiracy to Commit a Tort; and
- m. Punitive Damages.

4. The Complaint is currently venued in the Superior Court for the State of New Jersey, Hudson County Vicinage.
5. Defendants seek removal of this action to the United States District Court for the District of New Jersey under 28 U.S.C. §1441(b) because the Complaint alleges causes of action arising under the federal law, specifically 42 U.S.C. § 1983 and the United States Constitution.
6. A Notice of Filing the Notice of Removal to the United States District Court for the District of New Jersey, along with a copy of the within Notice, will be filed with the Clerk of the Superior Court of New Jersey in Trenton and with the Clerk of the Superior Court of New Jersey in Hudson County. Copies of both Notices will be served upon the Plaintiff.
7. All properly served Defendants to this action are represented by the Jersey City Law Department, and unanimously consent to Removal of this action from the Superior Court of New Jersey, Hudson County, to the United States District Court for the District of New Jersey.

WHEREFORE, Defendants request that this case proceed in the United States district Court for the District of New Jersey as an action properly removed thereto.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

JEREMY FARRELL

CORPORATION COUNSEL

Attorney for Defendants, City
of Jersey City and Jersey
City Police Department

By: /s/ Chaunelle Robinson

Chaunelle Robinson

Assistant Corporation Counsel

Date: April 20, 2017